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Attorneys for Defendant RSKCO SERVICES, INC.

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

JULIA M. BACKMAN, individually)	CIVIL NO. 04-00348 (HG KSC)
and on Behalf of the ESTATE OF)	(Contract)
DANIEL VERNON BACKMAN, and	(t	
as Next Friend to KELLY KEIKO)	DEFENDANT RSKCO
VALENE BACKMAN and JODI)	SERVICES, INC.'S MOTION TO
LEIGH YACHIYO BACKMAN,)	COMPEL COMPLIANCE WITH
Minors,)	SETTLEMENT AGREEMENT;
)	CERTIFICATE OF SERVICE
Plaintiffs,)	
)	
VS.)	
)	
RSKCO SERVICES, INC., a Illinois)	
corporation; JOHN DOES 1-10;)	
JANE DOES 1-10; DOE)	

PARTNERSHIPS 1-10, DOE)
CORPORATIONS 1-10; DOE)
LIMITED LIABILITY)
ENTITIES 1-10; DOE "NON-)
PROFIT" CORPORATIONS 1-10;)
and DOE GOVERNMENTAL	
ENTITIES 1-10,)
)
Defendants.)
)

DEFENDANT RSKCO SERVICES, INC.'S MOTION TO COMPEL COMPLIANCE WITH SETTLEMENT AGREEMENT

COMES NOW Defendant RSKCO SERVICES, INC. ("Defendant"), by and through its attorneys, Lyons, Brandt, Cook & Hiramatsu, and hereby moves this Court for an order compelling Plaintiffs to comply with the terms of the Settlement Agreement, Joint Tortfeasor Release and Indemnification Agreement ("Agreement") and for an order requiring Plaintiff JULIA M. BACKMAN ("Ms. Backman") to show cause as to why she has failed to comply with the terms of the Agreement. This Motion is based upon the grounds that: Ms. Backman, individually and as Next Friend to KELLY KEIKO VALENE BACKMAN ("Kelly") and JODI LEIGH YACHIYO BACKMAN ("Jodi"), minors, has failed to provide Defendant with an order from the court approving of the settlement of the claims of the minors, Kelly and Jodi.

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This Motion is brought pursuant to Rule 7 of the Federal Rules of Civil Procedure and is based on the memorandum attached hereto and the record and file herein.

DATED: Honolulu, Hawaii, January 4, 2007.

/s/ Edquon Lee

GEORGE W. BRANDT STEFAN M. REINKE EDQUON LEE BONNIE L. MOORE Attorneys for Defendant RSKCO SERVICES, INC.

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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

JULIA M. BACKMAN, individually)	CIVIL NO. 04-00348 (HG KSC)
and on Behalf of the ESTATE OF)	(Contract)
DANIEL VERNON BACKMAN, and)	
as Next Friend to KELLY KEIKO)	CERTIFICATE OF SERVICE
VALENE BACKMAN and JODI)	
LEIGH YACHIYO BACKMAN,)	
Minors,	
)	
Plaintiffs,)	
)	
vs.	
)	
RSKCO SERVICES, INC., a Illinois)	
corporation; JOHN DOES 1-10;)	
JANE DOES 1-10; DOE	
PARTNERSHIPS 1-10, DOE)	
CORPORATIONS 1-10; DOE)	
LIMITED LIABILITY)	
ENTITIES 1-10; DOE "NON-)	
PROFIT" CORPORATIONS 1-10;)	
and DOE GOVERNMENTAL)	
ENTITIES 1-10,	
)	
Defendants.)	
)	

CERTIFICATE OF SERVICE

I hereby certify that on this date a copy of the within document was duly served on the following:

PERSONAL
MAIL SERVICE

X

ROBERT D. KAWAMURA, ESQ.
550 Halekauwila Street, Suite 107
Honolulu, Hawaii 96813
Attorney for Plaintiffs
JULIA M. BACKMAN, individually and on Behalf
of the ESTATE OF DANIEL VERNON
BACKMAN, and as Next Friend to KELLY KEIKO
VALENE BACKMAN and JODI LEIGH
YACHIYO BACKMAN, Minors

DATED: Honolulu, Hawaii, January 4, 2007.

/s/ Edquon Lee
GEORGE W. BRANDT
STEFAN M. REINKE
EDQUON LEE
BONNIE L. MOORE
Attorneys for Defendant

RSKCO SERVICES, INC.

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